

David E. Patton  
Executive Director

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

October 3, 2022

**BY ECF**

Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Mr. Mangar's term of supervision  
shall expire on December 9, 2022.

SO ORDERED.



Ronnie Abrams, U.S.D.J.  
October 4, 2022

Re: United States v. Anil Mangar,  
15 Cr. 655 (RA)

Dear Judge Abrams:

I write to respectfully request that the Court terminate forthwith Anil Mangar's one-year term of supervised release, which was imposed on or about April 29, 2022. Dkt. No. 126. United States Probation takes no position on this application, but notes that Mr. Mangar has been fully compliant with supervision. The United States Government opposes the immediate termination of Mr. Mangar's supervised release, but does not object to the early termination of supervision on December 9, 2022, *i.e.*, one year from when Mr. Mangar's supervision would have expired but for the most recent VOSR proceedings.

The Court revoked Mr. Mangar's term of supervised release and imposed a sentence of time-served followed by one year of supervision on April 29, 2022. The revocation proceedings were inextricably intertwined with state charges that Mr. Mangar resolved favorably. In particular, Mr. Mangar pleaded guilty to a violation of NYPL § 215.50(3), second-degree criminal contempt, an A Misdemeanor, on the understanding that it would be reduced to a violation of NYPL § 240.26, a non-criminal violation, following his successful completion of a 26-week-long "Abusive Partner Intervention Program."

On August 15, 2022, Mr. Mangar completed the "Abusive Partner Intervention Program" (Exhibit A) and on August 26, 2022, his charges were reduced to a violation of NYPL § 240.26 (Exhibit B). Since then, Mr. Mangar has continued to comply with all of the terms of his supervision and respectfully submits that there is no longer a need for court-ordered supervision. Indeed, having completed the APIP early and satisfied the terms of his state-court conditional plea, Mr. Mangar has fulfilled his word to the Court and proved that he is ready to proceed with the rest of his life without the "sword of Damocles" hanging over his head. United States v. Haymond, 588 U.S. \_\_\_, 139 S. Ct. 2369, 2380 n.5 (2019) (Justice Gorsuch: "Even the dissent recognizes that the sword of Damocles hangs over a defendant every time he wakes up to serve a day of supervised release.")

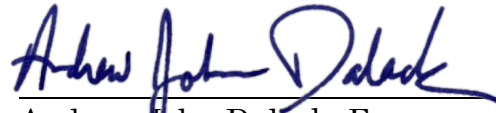
Honorable Ronnie Abrams  
October 3, 2022

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Re: United States v. Anil Mangar, 15 Cr. 655 (RA)

(quotations omitted). Against this backdrop, and given the Government's consent to termination two months from now on December 9, 2022, an additional term of supervision is greater than necessary.

Respectfully Submitted,

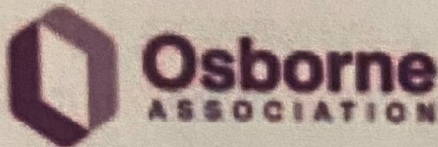
A handwritten signature in blue ink, reading "Andrew John Dalack". The signature is fluid and cursive, with the first name "Andrew" and last name "Dalack" clearly legible.

Andrew John Dalack, Esq.  
Assistant Federal Defender

Cc: AUSA Frank Balsamello

# EXHIBIT A





August 17, 2022

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Honorable Presiding Judge  
Bronx Criminal Court, Part DVM  
265 East 161<sup>st</sup> Street  
Bronx, NY 10451

**Re: Anil Mangar**  
**Docket # CR-003470-21BX**

**Dear Judge:**

This letter is submitted by the Osborne Association's Abusive Partner Intervention Program (APIP)<sup>1</sup> on behalf of, Anil Mangar, who on February 1, 2022, pled guilty to Harassment in the Second Degree (PL 240.26 [01]), a violation, and Criminal Contempt in the Second Degree (PL 215.50 [03]), a class A misdemeanor.

Mr. Mangar's case was referred to us on February 3, 2022, by Terri J. Roman, Project Director for the Bronx Domestic Violence Complex, to conduct an intake and assessment for our 26-week APIP program. On February 23, 2022, Mr. Mangar began the Dignity and Respect curriculum and, as of August 15, 2022, he has completed all 26 sessions.

Throughout his participation in APIP, Mr. Mangar was a positive addition to the group. Although initially guarded and resistant, Mr. Mangar eventually proved to be one of the more open and engaged participants in his group. He was willing to discuss past traumas and willing to be vulnerable and open to new perspectives. We appreciated that he used the platform to discuss ongoing challenges in his life including, but not limited to, the loss of his father and stressors surrounding a custody hearing. He was clear about how these stressors affected his life, open about where he believes he went wrong in his previous relationship and committed to not making the same mistake twice. As part of his final session, we discussed with Mr. Mangar the possibility of ongoing counseling services. He said he would give it some thought. We hope that Mr. Mangar will take advantage of the additional resources we can provide and that he can continue on a path free of abuse.

We thank the Court for its time and consideration on this matter.

Respectfully Submitted,

Emmanuel Lorenzo  
Program Coordinator

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The Osborne Association's Abusive Partner intervention program (APIP) is financed by the Mayor's Office of Criminal Justice. APIP delivers a 26-week or 16-week curricula based on practices and evidence-based approaches from around the country. It uses cognitive-behavioral strategies to help participants identify harmful thoughts, beliefs, actions, and values to create life skills and strategies that promote healthy relationships. APIP also provides other support services which include identifying appropriate community resources and programs.



# EXHIBIT B





ADJOURNMENT IN CONTEMPLATION OF DISMISSAL  
CONDITIONAL DISCHARGE  
PRE-SENTENCE CONDITIONS

PEOPLE OF THE STATE OF NEW YORK  
against  
**ANIL MANGAR**  
Defendant

County/Court **BX CRIMINAL**  
Return Part **CASHIER**  
Docket No. **CR-003470-21BX**  
NYSID No. **05973614K**

NATURE OF DISPOSITION:

ACD ☐ Defendant has received an Adjournment in Contemplation of Dismissal (ACD) [CPL §170.55 or 170.56].  
This case will be pending for a period of: ☐ SIX MONTHS ☐ ONE YEAR expiring on: \_\_\_\_\_

CONDITIONAL  
DISCHARGE

☒ Defendant was ☒ convicted of ☐ adjudicated a Youthful Offender for Vehicle and Traffic Law/Penal Law § **240.26(1)**  
and is sentenced by the Court to a ONE YEAR Conditional Discharge, to expire on **08/25/2023** and:

☐ a \_\_\_\_\_ term of imprisonment [for split sentence only]

☒ Defendant must pay a mandatory surcharge and other fees in the amount of \$ **120.00**

**\* CONDITIONAL PLEA SATISFIED - VACATE MISDEMEANOR PLEA \***

PRE-SENTENCE  
CONDITIONS

☐ Defendant was convicted of Penal Law §(§) \_\_\_\_\_ and \_\_\_\_\_ and the Court has adjourned  
sentencing pursuant to CPL § 400.10 to the "compliance adjournment date" listed below for the defendant to comply  
with the conditions listed below.

CONDITIONS OF DISPOSITION:

Further, as a condition(s) of the above disposition, defendant is required to lead a law-abiding life and:

- ☐ Pay a Fine in the amount of \$ \_\_\_\_\_
- ☐ Perform Community Service \_\_\_\_\_ Days. ☐ DA ☐ OTHER \_\_\_\_\_
- ☐ Complete a Substance Abuse Program : NAME OF PROGRAM \_\_\_\_\_
- ☐ Complete a Batterer's Intervention Program : NAME OF PROGRAM \_\_\_\_\_
- ☐ Other Program: ☐ DDP (B.A.C.) ☐ Treatment Readiness Program ☐ Other  
NAME OF PROGRAM \_\_\_\_\_
- ☐ Pay Restitution: The Court, having considered any victim impact statement, and having provided both the  
defendant and the District Attorney an opportunity to be heard, finds that the defendant must pay to the victim:
- a) Amount of restitution/reparation to be paid by the defendant through Safe Horizon is: \$ \_\_\_\_\_
- b) A ☐ 5% OR ☐ \_\_\_\_\_ % designated surcharge, total amount of the surcharge is \$ \_\_\_\_\_

TOTAL AMOUNT TO BE PAID TO SAFE HORIZON IS \$ \_\_\_\_\_

Restitution Payment Schedule: The total amount owed by the defendant will be paid as follows:

- ☐ Pay entire amount by \_\_\_\_\_. [Enter date prior to expiration of sentence.]
- ☐ Partial payment of \$ \_\_\_\_\_ on the date of sentencing, pay entire amount by \_\_\_\_\_.
- ☐ Pay equal installment of \$ \_\_\_\_\_ per ☐ month ☐ week ☐ bi-weekly starting on \_\_\_\_\_.

Restitution for Benefit of:

\_\_\_\_\_  
Name of Victim(s)

\_\_\_\_\_  
Address

- ☐ IGNITION INTERLOCK DEVICE: The defendant shall install and maintain an ignition interlock device (IID) in any  
motor vehicle owned, operated or rented by the defendant for a period of ☐ six months, ☐ one year or ☐ \_\_\_\_\_  
and agree to comply with orders and conditions set forth on a separate IID conditions form.

ADDITIONAL CONDITION(S): **170.10(8)(i) Determination**

ORDER OF PROTECTION: ☒ Full ☐ Limited

COMPLIANCE ADJOURNMENT DATE:

**11/14/2022 - Cashier**

**HON. AUDREY E. STONE, J.C.C.**

Judge of the Criminal Court

**08/26/2022**

Date

I have received a copy of the conditions of the above sentence and agree to comply with the Court's order and any  
authorized extensions.

I understand that a failure to comply with the aforementioned conditions or report on dates and times  
scheduled may result in a bench warrant for my arrest and imposition of a maximum alternative jail sentence of  
\_\_\_\_\_, or in the case of an ACD, the restoring of this case to the Court's calendar.

DEFENDANT **ANIL MANGAR**

DATE: **08/26/2022**

Interpreter: \_\_\_\_\_

DECLARATION OF DELINQUENCY

On the basis of the attached information, there is reasonable cause to believe that the defendant violated a condition of the  
sentence in this case. (CPL 410.30 & 410.40). Accordingly, subject to a final declaration, it is hereby declared that the  
defendant is delinquent and a warrant should be issued.